

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEFFREY LAYDON, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

MIZUHO BANK, LTD., *et al.*,

Defendants.

Case No. 12-cv-03419 (GBD)

**DEFENDANTS' NOTICE OF MOTION FOR
RECONSIDERATION OR FOR CERTIFICATION UNDER
28 U.S.C. § 1292(b) OF THE COURT'S MARCH 31, 2015 ORDER DENYING
THEIR MOTIONS TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, defendants Mizuho Corporate Bank, Ltd., The Bank of Yokohama, Ltd., The Shoko Chukin Bank, Ltd., Shinkin Central Bank, Sumitomo Mitsui Trust Bank, Ltd., Sumitomo Mitsui Banking Corporation, The Norinchukin Bank, The Bank of Tokyo-Mitsubishi UFJ, Ltd., Mitsubishi UFJ Trust and Banking Corporation, and Deutsche Bank AG (the "Moving Defendants"), by and through their undersigned counsel, will move this Court, before the Honorable George B. Daniels, United States District Judge, at the United States District Courthouse, 500 Pearl Street, New York, New York 10007, on the date and time to be set by the Court, for an order, pursuant to Rule 6.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York and Rule 12(b)(2) of the Federal Rules of Civil Procedure, (i) granting their motion for reconsideration or reargument of the Court's March 31, 2015 Order (Dkt. 446) (the "Order") and entering an order granting their motions to dismiss for lack of personal jurisdiction, or (ii) amending the Order to state that the Court finds that the issues in the Order

meet the criteria for an interlocutory appeal pursuant to 28 U.S.C. § 1292(b).

Dated: April 14, 2015

SHEARMAN & STERLING LLP

By: /s/Jerome S. Fortinsky
Jerome S. Fortinsky
John A. Nathanson
Jeffrey J. Resetarits
599 Lexington Avenue
New York, NY 10022
(212) 848-4000
jfortinsky@shearman.com
john.nathanson@shearman.com
jeffrey.resetarits@shearman.com

Attorneys for Defendant Mizuho Corporate Bank, Ltd.

DEBEVOISE & PLIMPTON LLP

By: /s/ Gary W. Kubek
Gary W. Kubek
Erica Weisgerber
919 Third Avenue
New York, NY 10022
(212) 909-6000
gwkubek@debevoise.com
eweisgerber@debevoise.com

Attorneys for Defendant The Bank of Yokohama, Ltd.

ARNOLD & PORTER LLP

By: /s/ Robert C. Mason
Robert C. Mason
399 Park Avenue
New York, NY 10022
(212) 715-1000
robert.mason@aporter.com

James W. Thomas, Jr.
Bret A. Finkelstein
555 Twelfth Street, NW
Washington, DC 20004
(202) 942-5000
james.thomas@aporter.com
bret.finkelstein@aporter.com

*Attorneys for Defendant The Shoko
Chukin Bank, Ltd.*

**PILLSBURY WINTHROP SHAW
PITTMAN LLP**

By: /s/ Andrew C. Smith
Andrew C. Smith
Andrew J. Kim
1540 Broadway
New York, NY 10036
(212) 858-1000
andrew.smith@pillsburylaw.com
andrew.kim@pillsburylaw.com

Attorneys for Defendant Shinkin Central Bank

SEWARD & KISSEL LLP

By: /s/ Dale C. Christensen, Jr.
Dale C. Christensen, Jr.
Michael B. Weitman
One Battery Park Plaza
New York, NY 10004
(212) 574-1200
Christensen@sewkis.com
Weitman@sewkis.com

*Attorneys for Defendant Sumitomo Mitsui
Trust Bank, Ltd.*

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Jon R. Roellke
Jon R. Roellke
2020 K Street, NW
Washington, DC 20006
(202) 373-6000
jon.roellke@morganlewis.com

Michael L. Spafford
PAUL HASTINGS LLP
875 15th Street, NW
Washington, DC 20005
(202) 551-1700
michaelspafford@paulhastings.com

*Attorneys for Defendant Sumitomo Mitsui
Banking Corporation*

SIDLEY AUSTIN LLP

By: /s/ Andrew W. Stern
Andrew W. Stern
Alan M. Unger
Tom A. Paskowitz
787 Seventh Avenue
New York, NY 10019
(212) 839-5300
astern@sidley.com
aunger@sidley.com
tpaskowitz@sidley.com

Attorneys for Defendant The Norinchukin Bank

SULLIVAN & CROMWELL LLP

By: /s/ Daryl A. Libow
Daryl A. Libow
Christopher M. Viapiano
1700 New York Avenue, NW, Suite 700
Washington, DC 20006
(202) 956-7500
libowd@sullcrom.com
viapianoc@sullcrom.com

*Attorneys for Defendants The Bank of Tokyo-
Mitsubishi UFJ, Ltd. and Mitsubishi UFJ Trust
and Banking Corporation*

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

By: /s/ Moses Silverman
Moses Silverman
Andrew C. Finch
Michael J. Biondi
1285 Avenue of the Americas
New York, NY 10019
(212) 373-3000
msilverman@paulweiss.com
afinch@paulweiss.com
mbiondi@paulweiss.com

Attorneys for Defendant Deutsche Bank AG